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FEDERAL COMMUNICATIONS COMMISSION

April 3, 1998

1154.012

**BY HAND**

Ms. Magalie Roman-Salas, Esq.  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

RE: In the Matter of Amendment of Section 73.202(b)  
Table of Allotments, FM Broadcast Stations  
Channel 231C3 Arcadia, Louisiana  
**PETITION FOR RULE MAKING**

Dear Ms. Roman-Salas:

Enclosed please find the original and four (4) copies of North Louisiana Gospel Association's Petition for Rule Making to amend the FM Table of Allotments to add Channel 231C3 at Arcadia, Louisiana, and for reservation of the channel for noncommercial educational use.

If you should have any questions regarding this matter, kindly direct them to the undersigned.

Yours truly,

Joseph C. Chautin, III

JCC,III:gp

Enclosures

cc: Stan Watts (w/encls.)

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Before the  
***Federal Communications Commission***  
Washington, D.C. 20554

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WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Amendment of §73.202(b)	)	MM Docket No.
Table of Allotments	)	
FM Broadcast Stations	)	
	)	RM
<b>ARCADIA, LOUISIANA</b>	)	
	)	
	)	
	)	

TO: Chief, Allocations Branch, Mass Media Bureau

**PETITION FOR RULE MAKING**

North Louisiana Gospel Association ("Petitioner") hereby files this Petition for Rule Making ("Petition"), seeking the allotment of a new class C3 FM Broadcast channel to Arcadia, Louisiana on Channel 231C3 and the reservation of the channel for noncommercial educational use.

The Petitioner hereby commits that if the channel is allotted, it will file an application for a construction permit to build a facility on the channel. If granted a permit, Petitioner will build and operate a station on the channel. Petitioner notes that presently, there is an FM Channel allotted to Arcadia. Therefore, it is clearly a community to which a station may be allotted.

Arcadia is listed in the 1992 Road Atlas of the United States published by the American Automobile Association as having a population, based on the 1990 census, of

3,403 persons. It is located in the north central portion of Louisiana, along Interstate Highway 20.

The attached Engineering Statement establishes that the channel can be allotted to Arcadia, Louisiana in conformance with the technical rules of the Commission, without requiring other changes to the Table of Allotments, FM Broadcast Stations.

In support of Petitioner's request that the channel be reserved for noncommercial educational use, the Engineering Statement also includes an allocation study demonstrating the preclusion of all channels in the reserved band (Channels 201-220) from use in Arcadia. Petitioner notes that generally, the Commission has been hesitant to reserve for noncommercial educational use channels outside of the reserved band. However, exceptions have been made where channels in the noncommercial band are not available. See Bozeman, Montana, MM Docket No. 98-23, DA 98-325 (*released February 27, 1998*); Butte, Montana, 9 FCC Rcd 2180 (1994); Buhl, Minnesota, 9 FCC Rcd 2606 (1994). In granting exceptions, the Commission has generally cited conflicts with foreign allotments or potential interference to operation on VHF television channel 6 as grounds for reserving commercial channels for noncommercial use.

Petitioner submits that an exception is warranted in this case for two reasons. First, there are no noncommercial channels available for use in Arcadia that would not produce objectionable interference to either existing or proposed protected facilities operating in the reserved band. Petitioner is therefore precluded from filing an application for a noncommercial educational channel at Arcadia.

Second, the educational portion of the FM band is effectively closed to new authorizations at Arcadia due to the proximity of Channel 6 Station KTAL, Texarkana,

Texas and WDSU at New Orleans, Louisiana. Therefore, even with the minimum possible class A facilities, it would be impossible for a station operating in the reserved band to adequately serve the community of Arcadia without causing interference to channel six television reception, as interference is defined by section 73.525 of the Commission's Rules, 47 C.F.R. §73.525.


Although Arcadia does have one commercial allotment, there are no non-commercial FM stations licensed to it. Thus, the proposed allotment, if reserved for noncommercial use, will permit the community to have its first noncommercial voice.

It is respectfully submitted that provision of a first noncommercial service would be of greater public interest benefit than would be the allotment of another commercial channel to the community.

Petitioner submits that under these circumstances, the allotment and reservation of commercial Channel 231C3 is the only way to provide Arcadia, Louisiana, with its own noncommercial service.

Respectfully Submitted,

NORTH LOUISIANA GOSPEL ASSOCIATION

  
By its Counsel,

Joseph C. Chautin, III  
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(504) 830-4646

Dated: April 3, 1998

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ENGINEERING STATEMENT  
IN SUPPORT OF PETITION FOR RULE MAKING  
ARCADIA, LOUISIANA  
CHANNEL \*231C3

This Engineering Statement was prepared in support of the proposed allotment of Channel \*231C3 to Arcadia, Louisiana. It is proposed that Channel \*231C3 be allotted as a non-commercial educational FM (NCE-FM) broadcast station. (Consistent with the FCC Rules, this is indicated with an asterisk by the channel number.) It is demonstrated below that there are no channels otherwise available for Arcadia for NCE-FM use in the reserved portion of the FM band.

An allocation study was prepared in consideration of the separation requirements of Section 73.207 of the FCC Rules and the coverage requirements of Section 73.315 of the FCC Rules for Channel \*231C3 at Arcadia. It was determined that a significant fully-spaced area-to-locate exists for Channel \*231C3. Reference coordinates for Channel \*231C3 at Arcadia within the fully-spaced zone were chosen as indicated in Table I below:

<b>Table I - Reference Coordinates for Channel *231C3 at Arcadia, Louisiana</b>	
	32°33'00"N
	92°55'12"W

The reference site was taken from the Index to the *National Atlas of the United States of America* pursuant to Section 73.208 of the FCC Rules.

Arcadia, Louisiana

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A separation study prepared utilizing the above listed reference coordinates indicates that the proposed allotment meets the separation requirements of Section 73.207 of the FCC rules with respect to all existing or proposed allotments and assignments. Table II below summarizes the separation study prepared with respect to all pertinent allotments and assignments:

<b>Table II - Separation Study for Channel *231C3 at Arcadia Using Proposed Allotment Reference Coordinates</b>							
Call Status	City State	Channel FCC File No.	Latitude Freq. Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)	
KITT LIC	Shreveport LA	229C BLH840607CO	32-40-39 93.7 93-55-41	278.8	95.68 - .32	96 SHORT	
<i>(Separation requirement met under rounding provisions of Section 73.208(c)(8) of the FCC Rules.)</i>							
KFAD LIC	Alexandria LA	230A BLH930223KB	31-16-04 93.9 92-26-24	162.2	149.26 60.26	89 CLEAR	
KKPT LIC	Little Rock AR	231C BLH911018KN	34-47-56 94.1 92-29-44	8.8	252.52 15.52	237 CLOSE	
KTRYFM LIC	Bastrop LA	232A BLH6141	32-49-10 94.3 91-54-29	72.2	99.51 10.51	89 CLOSE	
KRUF LIC	Shreveport LA	233C BLH880314KB	32-40-13 94.5 93-55-59	278.3	96.03 .03	96 CLOSE	
KTOCFM LIC	Jonesboro LA	285C3 BLH960605KD	32-13-28 104.9 92-43-27	153.0 SS	40.54 26.54	14 CLEAR	

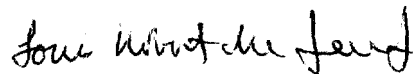
As indicated above, the separation requirements are met from the proposed Arcadia reference site.

An allocation study was conducted to determine the availability of a channel in the reserved portion of the FM band (Channels 201 to 220). The determination of channel preclusion was made based on the calculated distance to the predicted protected or interfering contour

of any existing or proposed protected facilities, taking into account the distance of Arcadia from the potentially precluding station. As demonstrated below, all channels are precluded from use in Arcadia.

<b>Table III - Summary of allocation study for Channels 201 to 220 at Arcadia-LA</b>	
Channel(s)	Reason for Preclusion
201	KAYT, Jena, LA, Channel 201C1, 70 kW, 322 m
202	KAPI, Ruston, LA, Channel 202A, 0.25 kW, 89 m
203	NEW, Jonesboro, LA, Channel 203A, 2 kW, 52 m
204	NEW, Monroe, LA, Channel 204C3, 25 kW, 59 m
205-207	KLPI, Ruston, LA, Channel 206A, 4 kW, 107 m
208	KYFL, Monroe, LA, Channel 208C2, 25 kW, 124 m
209-211	KDAQ, Shreveport, LA, Channel 210C1, 100 kW, 302 m
212-213	KEDM, Monroe, LA, Channel 212C1, 87 kW(DA), 269 m
214	KLSA, Alexandria, LA, Channel 214C, 100 kW, 394 m
215-220	KGRM, Grambling, LA, Channel 218C2, 50 kW, 175 m

Given the demonstration of the lack of availability of channels for NCE-FM use at Arcadia, the proponent requests the allotment of Channel \*231C3 as an NCE-FM channel.



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March 4, 1998